

**SUPREME COURT
OF THE
STATE OF CONNECTICUT**

NO. X06-UWY-CV-18-6046436 S

NO. X06-UWY-CV-18-6046437 S

NO. X06-UWY-CV-18-6046438 S

COMPLEX LITIGATION DOCKET AT WATERBURY

S.C. _____

**Lafferty, Erica, et al.
Plaintiffs-Respondents**

v.

**Jones, Alex Emric, et al.
Defendants-Applicants**

APPLICATION FOR CERTIFICATION TO APPEAL PURSUANT TO C.G.S. §52-265a
AND ATTACHED APPENDIX

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QUESTION OF LAW FOR APPEAL

Whether, under the first amendment to the United States Constitution, the fourteenth amendment to the United States Constitution, and the Connecticut anti-SLAPP statute, Judge Bellis erred when, without even providing a meaningful opportunity to be heard, she denied the Defendants their right to pursue their Special Motion to Dismiss for the valid exercise of their first amendment rights?

THE NATURE OF THE APPLICATION

Despite the clear requirements of *Brandenberg v. Ohio*, 395 U.S. 444 (1969) and *Virginia v. Black*, 538 U.S. 343 (2003), holding that speech, even hateful and vile speech, enjoys first amendment protection unless it incites imminent unlawful action, the trial court entered serious sanctions against Alex Jones and Infowars for a televised rant that posed no such threat of harm. Succumbing to the histrionic posturing of the plaintiffs' lawyers in a lawsuit attacking the defendants' right to speak freely about the Sandy Hook shootings in Newtown in 2012, the court twice eviscerated freedom of speech: first, by sanctioning Mr. Jones for protected speech; second, by refusing even to hear his special motion to dismiss a lawsuit filed against him by the Sandy Hook families. This shocking departure from well-settled first amendment principles, done abruptly and without adequate notice or a meaningful opportunity to be heard, requires review.

This is the second time Mr. Jones has sought the intervention of this Court in this highly unusual litigation. Initially, in a case of first impression, the trial court (Bellis, J.), found "good cause" for almost boundless discovery, without setting forth any basis for the fishing expedition she authorized. See Orders of December 17, 2018 (Entry Nos.

123.10, 126.10, & 129.10). Then, in an all too foreseeable series of events, that boundless discovery led to manufactured claims of foul play and cries for denial of the Special Motion to Dismiss, a sanction not contemplated by the statutes, nor justifiable on the facts. This Court declined to hear the first appeal; weekly “emergency” hearings ensued, working endless delay in reaching the merits of the defendants’ motion.

Now, the Defendants seek vindication yet again for the exercise of those very first amendment rights Judge Bellis’ sanctions silence: on June 18, 2019, the Court denied the Defendants the right to pursue their special motion to dismiss on specious grounds composed of an unholy amalgam of alleged discovery violations and the base alloy of perceived threats against opposing counsel¹. The Court ruled after viewing a broadcast and reading a transcript of statements made by Mr. Jones on June 14, 2019.

Yet Mr. Jones’s speech was nothing more than an angry rant made in a public forum; it comes nowhere close to the “imminent Incitement” or “true threat” territory with which this Court is so familiar². The rant took place days after Mr. Jones learned that child pornography had been embedded in emails disclosed to the defendants in discovery; those emails were turned over to federal officials. To say that Mr. Jones was outraged to learn about this is an understatement.

¹ In an unsettling display of partisanship, the judge even injected herself into the matter as a witness, claiming to have heard threatening statements in the broadcasts at issue that were not captured in the transcript and relying upon those statements as facts: “Court: Now the transcript doesn’t reflect this, but when I listened to the broadcast, I heard, ‘I’m going to kill.’ Now, that’s not in the transcript, but that is my read and understanding and what I heard in the broadcast.” 6/18/19 Hearing Transcript at 5.

² See *Noto v. United States*, 367 U.S. 290 (1961), *Brandenburg v. Ohio*, 395 U.S. 444 (1969), *NAACP v. Claiborne Hardware Co.*, 458 U.S. 886 (1982), *Virginia v. Black*, 538 U.S. 343 (2003).

Moreover, there was no nexus between the offending conduct and the sanction imposed. Similarly, there was no calibration of the sanction to the level of the offense, effectively imposing the death penalty on the defendants' statutory right to pursue their special motion to dismiss, a sanction that is out of proportion to the alleged offense by orders of magnitude. Even if the sanction imposed had had some nexus to the alleged offense, and had it been calibrated to the magnitude of the alleged offense, it would still have been error as Judge Bellis gave the defendants no meaningful right to be heard on the sanction. The Connecticut anti-SLAPP statute was designed to enhance the freedom of the press, amplifying protected speech like a bullhorn; but in Bellis's hands, that bullhorn has become a muzzle. An anxious nation watches to see whether this assault on free speech will stand. Does Connecticut give its own special solicitude? When a Texan speaks about shooting at Sandy Hook in 2012, do Connecticut courts grow deaf to the first amendment?

Pursuant to Conn. Gen. Stat. § 52-265a and Practice Book §83-1, Defendants Alex Emric Jones, Infowars, LLC, Infowars Health, LLC, Free Speech Systems, LLC, and Prison Planet TV, LLC ("Defendants"), apply for certification to appeal from the Order of June 18, 2019 (Entry No. 269.00) denying the Defendants' their right to pursue their Special Motion to Dismiss in contravention of the first amendment, the Connecticut anti-SLAPP statute, and the Defendants' rights to due process of the law.

BRIEF HISTORY AND STATEMENT OF THE CASE

On June 14, 2019, on a regularly scheduled broadcast of his nationally syndicated talk show, Mr. Jones lashed out at the party responsible for sending child pornography in emails he neither opened nor viewed, offering a \$1 million reward for information

leading to the arrest and conviction of the perpetrator. Mr. Jones, regarded as a conspiracy theorist, thought it no coincidence that items were “discovered” shortly after being turned over to the plaintiffs’ lawyers. Mr. Jones identified plaintiff’s counsel, and former candidate for Attorney General, Chis Mattei, at one point displaying a picture of him and slamming a fist down on the picture. He then commented in the third person plural in violent terms about the person who sent him the child pornography, promising, at one point, to see the person’s head on a pike. It was a profane performance by a man filled with rage at having been labeled a child pornographer. Among the things Mr. Jones said is:

"ALEX JONES: I want them to track it back to track it back to you-know-who.

NORM PATTIS: You are not a suspect. You are not a person of interest. You are a victim. And that’s the story here.

ALEX JONES: I wonder who the person of interest is.

NORM PATTIS: Look, are you showing Chris Mattei’s photograph on here?

ALEX JONES: Oh, no. That was an accidental cut. He’s a nice Obama boy. He’s a good --

NORM PATTIS: Chris Mattei is your adversary in this litigation, just as I am the adversary of the people that have sued you. And it is my responsibility to take their case apart if I can. And he will attack you.

ALEX JONES: He’s a white Jewboy³ that thinks that he owns America.

NORM PATTIS: I’m not going to engage in a personal attack on Chris Mattei. I want to find out who sent the emails to you. And when I find that person, then I will go to war. Alex --

ALEX JONES: I’ve talked to IT. You understand, hidden links in an email no one looked at, to find that is like finding a needle in 5,000 haystacks."

IW Trans 6/14/19, at 27-28 (Koskoff Trans.)

Judge Bellis adds that she heard even more inflammatory statements, in the form of death threats, that do not occur anywhere in the broadcast or the transcripts

³ This reference comes from a transcript provided by the plaintiffs’ lawyers. Mr. Jones has filed a certified copy of the transcript prepared by an independent reporter, Delores Falzarano. What he said is “white shoe boy.” A motion to correct the record is pending before the trial court.

produced by either party, stating on the record: “Now, the transcript doesn’t reflect this, but when I listened to the broadcast, I heard, I’m going to kill. Now, that’s not in the transcript, but that is my read and understanding and what I heard in the broadcast.” Hearing Trans., at 50.

The plaintiffs filed an emergency motion for relief, requesting an expedited briefing schedule. Judge Bellis did them one better, holding a sanctions hearing, even entertaining a default, without notice of an adequate opportunity to be heard, giving defense counsel but an hour to review the one case on which she relied, *Maurice v. Chester Housing Authority*, ___ Conn. App. ___ (2019), a case relying upon the court’s inherent authority to supervise conduct of litigants appearing before it. It does not appear as if the parties in *Chester* sought certification for review. Unfortunately, Bellis gave the defendants no time to meaningfully respond or prepare for the plaintiffs’ motion, and they were not able to effectively respond to this grievous misstatement during the hearing.

Judge Bellis read portions from these sections into the record, taking them out of context, and stating “And those are just the portions of the transcript that the Court relied on. The Court has no doubt that Alex Jones was accusing Plaintiffs’ Counsel of planting child pornography.” Hearing Trans, at 52. The Court goes on to hold that “I reject the Jones defendants’ claim that Alex Jones was enraged. I disagree with Attorney Pattis’ representation here. I find based upon a review of the broadcast clips that it was an intentional, calculated act of rage for his viewing audience.” Hearing Trans., at 53. Mr. Jones made clear in a subsequent broadcast the following day that he was not attacking Mr. Mattei. The trial court reached conclusions about Mr. Jones’

state of mind without giving him a chance to address the issue either by way of affidavit or live testimony.

ARGUMENT

I. The First Amendment Was Twice Violated: First, By Permitting The Plaintiffs To Turn Limited "Expedited" Discovery Into A Litigation Sword Used To Avoid A Decision On The Merits; And, Second, By Sanctioning The Defendants For Engaging In Protected Speech – Punishing Any Litigant, Especially A National Broadcaster, For Speaking Is A Quintessential Matter of Public Concern

"[A]ny party to an action who is aggrieved by an order or decision of the Superior Court in an action which involves a matter of substantial public interest and in which delay may work a substantial injustice, may appeal ... from the order or decision to the Supreme Court within two weeks from the date of the issuance of the order or decision. "Conn. Gen. Stat. § 52-265a; see also, Practice Book § 83-1 (same). "It is well established ... that appeals from interlocutory orders may be taken pursuant to § 52-265a." *Foley v. State Elections Enforcement Comm'n*, 297 Conn. 764, 770 n. 2 (2010).

A. This is a matter of substantial public interest

The Court has identified relevant factors as to "substantial public interest": 1) whether the order affects an important legal principle or public policy. *See, e.g., Metro. Life Ins. Co. v. Aetna Gas. & Sur. Co.*, 249 Conn. 36, 48 (1999); 2) Whether the order affects the public interest at-large, as opposed "to only the parties. *See, e.g., State v. Fielding*, 296 Conn. 26, 35 n.7 (2010); 3) Whether the order accounts for the interests of the public. *See, id.*; and 4) Whether the "special circumstances of this case fit within the substantive ambit of General Statutes § 52-265a (a)[.]" *State v. Ayala*, 222 Conn. 331, 341 (1992). These factors are met. The trial court's order denying the Defendants their right to pursue their special motion to dismiss affects a public policy so important—

the right to participate in public affairs like the exercise of first amendment rights— that the legislature created the special statutory mechanisms⁴ at issue here specifically to protect these policy interests⁵. Recognizing that often the goal of a quintessential SLAPP suit is not to win, but simply—as the case appears to be here—to bankrupt a disruptive journalist into silence, the legislature enacted C.G.S. §52-196a on June 30, 2017. "According to the session transcripts from the debate concerning §52-196a, the general intent was to protect the free flow of ideas amongst people and to get lawsuits that would jeopardize this notion dismissed as early as possible." *Rivas v. Pepi*, 2018 Conn. Super. LEXIS 1797, at *4 (Super. Ct. Aug. 16, 2018). Defendants are aware of only three other state cases involving the law: *Graves v. Chronicle Printing Co.*, No. TTD-CV-18-5010056-S; *Cronin v. Pelletier*, No. ITD-CV-18-6014395-S; and *Rivas v. Pepi*, No. FST-CV-18-6034927-S. None of the dockets reflect a request for discovery. This case will standardize what discovery is permitted and, given the broad scope of discovery permitted, will likely undermine the purpose of the statute and result in every plaintiff being permitted to serve similarly broad requests.

Interlocutory appeal will serve the public at large. The Court previously permitted interlocutory appeal, where "by allowing this appeal and establishing rules for trial courts

⁴"In any civil action in which a party files a complaint ... against an opposing party that is based on the opposing party's exercise of its right of free speech ... under the Constitution of the United States or the Constitution of the state in connection with a matter of public concern, such opposing party may file a special motion to dismiss the complaint. ... " Conn.Gen. Stat. § 52-196a(b).

⁵ The reason for the law was that the "CT Broadcasters Association wanted to see legislation end these types of lawsuits (Strategic Litigation Against Public Participation, SLAPP) which affect the media the most in their exercise of first amendment rights to free speech and not have to fight constant frivolous and often expensive litigation." 2017 Legis. Bill Hist. CT S.B. 981 (Mar. 31, 2017).

to follow in insurance coverage disputes. this court will serve a substantial public interest. "*Metro. Life Ins. Co. v. Aetna Cas. & Sur. Co.*, 249 Conn. 36, 50 (1999). By establishing rules under the anti-SLAPP law, the Court will serve the same interest. Plaintiffs' primary argument related to discovery as to editorial and investigatory practices, as well as the defendants' financial motivations, as they relate to the issue of actual malice. Because the statute requires that the speech be on a matter of public concern, nearly all plaintiffs facing a special motion to dismiss will be public figures or officials, to whom the actual malice requirement applies. As such discovery orders would evade appellate review, this case will guide all future litigation.

Notably, the orders do not account for the interests of the public. Nothing in any of the written or oral statements of the trial court reflect on the public interest in limiting SLAPP suits. "Good cause" was found, without explanation or specification as to the issue(s) for which it was found, and without any review of the issues that could be narrowed as a matter of law. Objections were overruled without explanation or discussion of how the requests were specific or limited. Plainly stated, the judge's discovery orders sought to ram the broad blade of general discovery principles into the needle's eye of the specific, limited discovery that is the exception, rather than the rule, under the anti-SLAPP statute. The public interest requires guidance by the judiciary - otherwise, the statute will be rendered meaningless if the trial court simply permits broad discovery into impertinent issues, with virtually no limitation.

Finally, special circumstances warrant interlocutory review. As the Court observed:

It is settled law that "a colorable claim to a right to be free from an action is protected from the immediate and irrevocable loss that would be occasioned

by having to defend an action through the availability of an immediate interlocutory appeal from the denial of a motion to dismiss." *Dayner v. Archdiocese of Hartford*, [301 Conn. 759,] 771 [(2011)]; ... see also *Convalescent Center of Bloomfield, Inc. v. Dept. of Income Maintenance*, 208 Conn. 187, 194, 544 A.2d 604 (1988) ("[w]e have held an interlocutory order to be final for purposes of appeal if it involves a claimed right the legal and practical value of which would be destroyed if it were not vindicated before trial" [internal quotation marks omitted]).

Trinity Christian Sch. v. Comm'n on Human Rights & Opportunities, 329 Conn. 684, 693-94, (2018).

II. The Defendants Were Entitled To More Than Summary Process Given The Allegations And The Stakes

This case bears an uncanny similarity to the reversal of a disciplinary sanction imposed on trial counsel in a criminal case, *Disciplinary Counsel v. Williams*, 166 Conn. App. 557 (2016). In that case, trial counsel twice ran afoul of court rulings, once while cross-examining a witness, a second time during closing argument. At the time of the alleged misconduct, the court informed counsel it should prepare for a later disciplinary hearing. The underlying defendant was convicted. After sentencing, the trial court moved immediately into a sanctions hearing.

The Appellate Court noted that this manner of proceeding did not afford trial counsel, who was now the party in interest in the disciplinary proceeding, with adequate notice or a meaningful opportunity to prepare. It did so even though trial counsel had been on notice for weeks that he should prepare for such a hearing. The Appellate Court remanded the matter because trial counsel was given inadequate notice such that he could not meaningfully prepare for the hearing. *Id.*, p. 572.

The defendants in the instant action were given far less notice than trial counsel enjoyed in *Williams*. Mr. Jones uttered statements on June 14, 2019, a Friday. By Monday, June 17, 2019, the plaintiffs had moved for relief, requesting expedited

briefing. The trial court dispensed with briefing, and even notice, moving immediately to a hearing, imposing serious sanctions without notice or an opportunity to be heard.

This case stands as an abject object lesson in how not to handle an anti-SLAPP motion to dismiss. The plaintiffs waited for years to bring an action well beyond the applicable statute of limitations for most of its claims. They then persuaded the court to permit limited “expedited” discovery. Plaintiffs counsel then transformed this discovery process into a perpetual state of crisis in which they, the non-moving party, claimed emergency – requiring costly weekly hearings. In the end, they succeeded in turning the first amendment against itself, a result that would surely shock lawmakers who enacted an anti-SLAPP statute to protect freedom of speech.

For the foregoing reasons, the defendants apply for certification to appeal. Alex Jones may not be popular, but freedom of speech is the lifeblood of the republic.

Respectfully submitted,

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INFOWARS HEALTH, LLC, FREE
SPEECH SYSTEMS, LLC, AND PRISON
PLANET TV, LLC
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THEIR ATTORNEYS

CERTIFICATION

The undersigned, on behalf of the Defendants-Applicants, hereby certifies that the Petition and Appendix complies with the provisions of Practice Book §§ 66-3 and 67-2. Undersigned hereby certifies that the foregoing petition complies with the form and font requirements of P.B. § 62-7 & 84-5, and that the font used is Arial12.

This is to further certify that, in accordance with Practice Book §§ 62-7 (g) and (h), true copies of the foregoing were submitted electronically and electronically delivered to the last known email address for council. This also certifies that the foregoing does not include any names and/or personal identifying information that is prohibited from disclosure by rule, statute, court order or case law.

/S/ NORMAN A. PATTIS /S/

CERTIFICATION

This is to certify and a copy of the foregoing has been emailed and/or mailed, this 2nd day of July 2019

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**SUPREME COURT
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NO. X06-UWY-CV-18-6046436 S

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COMPLEX LITIGATION DOCKET AT WATERBURY

S.C. _____

**Lafferty, Erica, et al.
Plaintiffs-Respondents**

v.

**Jones, Alex Emric, et al.
Defendants-Applicants**

THE DEFENDANTS – APPLICANTS ATTACHED APPENDIX

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NO: UWY-CV18-6046437 S	:	SUPERIOR COURT
SHERLACH, WILLIAM	:	JUDICIAL DISTRICT
	:	OF FAIRFIELD
V.	:	AT BRIDGEPORT, CONNECTICUT
JONES, ALEX, ET AL.	:	JUNE 18, 2019

NO: UWY-CV18-6046438 S	:	SUPERIOR COURT
LAFFERTY, ERICA, ET AL.	:	JUDICIAL DISTRICT
	:	OF FAIRFIELD
V.	:	AT BRIDGEPORT, CONNECTICUT
JONES, ALEX EMRIC, ET AL.	:	JUNE 18, 2019

NO: UWY-CV18-6046436 S	:	SUPERIOR COURT
SHERLACH, WILLIAM, ET AL.	:	JUDICIAL DISTRICT
	:	OF FAIRFIELD
V.	:	AT BRIDGEPORT, CONNECTICUT
JONES, ALEX EMRIC, ET AL.	:	JUNE 18, 2019

BEFORE THE HONORABLE BARBARA N. BELLIS, JUDGE
E X C E R P T

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1 **(EXCERPT)**

2 THE COURT: All right. So I'm going to start
3 with the discovery issues.

4 Putting aside the fact that the documents the
5 Jones defendants did produce contained child
6 pornography, putting aside the fact that the Jones
7 defendants filed with the Court a purported affidavit
8 from Alex Jones that was not in fact signed by Alex
9 Jones, the discovery in this case has been marked
10 with obfuscation and delay on the part of the
11 defendants, who, despite several Court-ordered
12 deadlines as recently as yesterday, they continue in
13 their filings to object to having to, what they call
14 affirmatively gather and produce documents which
15 might help the plaintiffs make their case. Despite
16 over approximately a dozen discovery status
17 conferences and several Court-ordered discovery
18 deadlines, the Jones defendants have still not fully
19 and fairly complied with their discovery obligations.

20 By way of one example, on June 10th, counsel for
21 the Jones defendants stated in their filing that Alex
22 Jones' cellphone had only been searched for emails,
23 not for text messages or other data. In their June
24 17 filing, defendants still try to argue with respect
25 to the text messages that there is little to no
26 personal nexus between the text messages and the
27 litigation, and that the plaintiffs are simply prying

1 into the Alex Jones defendants' personal affairs.
2 But the discovery objections were ruled on by the
3 Court months ago and the defendants still have not
4 fully and fairly complied.

5 Also, as another example, the Google Analytics
6 data was ordered to be produced. And this is a
7 Google Analytics account that had to be created and
8 set up by and utilized, according to the testimony,
9 by some of the Jones defendants. Only a 35-page
10 report was produced. In their June 17 filing, the
11 Jones defendants apparently say that they don't
12 possess the data themselves and they should not have
13 to get it from Google because Google holds Alex Jones
14 in contempt. And anything that Google generated
15 would be, and I quote, inherently unreliable,
16 unquote. And again, the Jones defendants miss the
17 mark. They were ordered to produce that data.

18 Our rules of practice require a party to produce
19 materials and information, quote, within their
20 knowledge, possession, or power; and it is clearly
21 within the power of the Jones defendants to obtain
22 the information from Google if, as they claim, they
23 don't possess it themselves. So their objection is
24 too late and their failure to fully and fairly comply
25 is inexcusable.

26 So in short, we've held approximately a dozen
27 discovery status conferences. The Court's entered

1 discovery deadlines, extended discovery deadlines,
2 and discovery deadlines have been disregarded by the
3 Jones defendants, who continue to object to their
4 discovery and failed to produce that which is within
5 their knowledge, possession, or power to obtain. And
6 again, among the documents that they did produce
7 contained images of child pornography.

8 I also note that the Jones defendants have been
9 on notice from this Court both on the record and in
10 writing in written orders that the Court would
11 consider denying them their opportunity to pursue a
12 special motion to dismiss if the continued
13 noncompliance continued.

14 Now with respect to the plaintiffs' request for
15 immediate review and the Jones defendants' objections
16 thereto, as I've said, I've reviewed the -- both
17 broadcasts several times. The law is clear in
18 Connecticut and elsewhere, for that matter, that the
19 Court has authority to address out-of-court bad-faith
20 litigation misconduct where there is a claim that a
21 party harassed or threatened or sought to intimidate
22 counsel on the other side. And indeed, the Court has
23 the obligation to ensure the integrity of the
24 judicial process and functioning of the Court.

25 So if Mr. Jones truly believed that Attorney
26 Mattei or anyone else in the Koskoff firm planted
27 child pornography trying to frame him, the proper

1 course of action would be to contact the authorities
2 and/or to have your attorney file the appropriate
3 motions in the existing case. Just by way as an
4 example, the Jones defendants here could have filed a
5 motion asking that the lawsuits be dismissed for that
6 reason.

7 What is not appropriate, what is indefensible,
8 unconscionable, despicable, and possibly criminal
9 behavior is to accuse opposing counsel, through a
10 broadcast, no less, of planting child pornography,
11 which is a serious felony. And to continue with the
12 accusations in a tirade or rant for approximately 20
13 minutes or so.

14 Now, because I want to make a good record for
15 appeal, I'm going to refer to certain portions of the
16 transcript of the website. And I would note that Mr.
17 Jones refers to Attorney Mattei as a Democratic-
18 appointed US attorney, holds up on the camera
19 Attorney Mattei's Wikipedia page which indicates that
20 he is a Democrat, and puts the camera on the website
21 page, which looks like it's from the law firm.

22 Alex Jones states: what a nice group of
23 Democrats. How surprising, what nice people. Chris
24 Mattei, Chris Mattei. Let's zoom in on Chris Mattei.

25 Oh, nice, little Chris Mattei. What a good
26 American. What a good boy. You'll think you'll put
27 me on.

1 Now, the transcript doesn't reflect this, but
2 when I listened to the broadcast, I heard, I'm going
3 to kill. Now, that's not in the transcript, but that
4 is my read and understanding and what I heard in the
5 broadcast.

6 He continues to say: anyways, I'm done. Total
7 war. You want it, you got it. I'm not into kids
8 like your Democratic Party, you cocksuckers, so get
9 ready.

10 And during this particular tirade, he slammed
11 his hand on Attorney Mattei's picture, which was on
12 the camera at that point.

13 He continues on shortly thereafter: the point
14 is, I'm not putting up with these guys anymore, man,
15 and their behavior because I'm not an idiot. They
16 literally went right in there and found this hidden
17 stuff. Oh, my god, oh, my god, and they're my
18 friends. We want to protect you now, Alex. Oh,
19 you're not going to get into trouble for what we
20 found. F you, man, F you to hell. I pray God, not
21 anybody else, God visit vengeance upon you in the
22 name of Jesus Christ and all the saints. I pray for
23 divine intervention against the powers of Satan.

24 I literally would never have sex with children.
25 I don't like having sex with children. I would
26 never have sex with children. I am not a Democrat.
27 I am not a Liberal. I do not cut children's genitals

1 off like the left does.

2 Further on, referring to the person who sent the
3 child porn, he says: I wonder who the person of
4 interest is. Continues to say: oh, no. Attorney
5 Pattis says: look, are you showing Chris Mattei's
6 photograph on here; and the record should reflect
7 that when Alex Jones said I wonder who the person of
8 interest is, Attorney Mattei's photo was on the
9 camera. Again, referring to who planted the child
10 pornography. Then Alex Jones says: oh, no, that was
11 an accidental cut. He's a nice Obama boy. He's a
12 good -- then Attorney Pattis cuts him off. Attorney
13 -- Alex Jones goes on to say: he's a white Jew-boy
14 that thinks he owns America.

15 Later on in the broadcast, Alex Jones says,
16 quote, the bounty is out, bitches. And you know your
17 feds, they're going to know you did it. They're
18 going to get your ass you little dirt bag. One
19 million, bitch, it's out on your ass.

20 Shortly thereafter, he says: a million dollars
21 is after them. So I bet you'll sleep real good
22 tonight, little jerk, because your own buddies are
23 going to turn you in and you're going to go to
24 prison, you little white Jew-boy jerk-off son of a
25 bitch. I mean, I can't handle them. They want more,
26 they're going to get more. I am sick of these
27 people, a bunch of chicken-craps that have taken this

1 country over that want to attack real Americans.

2 And those are just portions of the transcript
3 that the Court relied on. The Court has no doubt
4 that Alex Jones was accusing Plaintiffs' Counsel of
5 planting the child pornography.

6 Again, these are just a few examples where Jones
7 either directly harasses or intimidates Attorney
8 Mattei, repeatedly accuses Plaintiffs' Counsel of
9 requesting the metadata so they could plant the child
10 pornography, continues to call him a bitch, a sweet
11 little cupcake, a sack of filth, tells him to go to
12 hell, and the rant or tirade continues with frequent
13 declarations of war against Plaintiffs' Counsel.

14 I reject the Jones defendants' claim that Alex
15 Jones was enraged. I disagree with Attorney Pattis's
16 representation here. I find based upon a review of
17 the broadcast clips that it was an intentional,
18 calculated act of rage for his viewing audience. So
19 -- and I note as Plaintiffs' Counsel pointed out,
20 that Alex Jones was the one who publically brought
21 the existence of the child pornography to light on
22 his Infowars show.

23 But putting that aside, putting aside whether it
24 was -- he was in a real rage or whether he was acting
25 out rage, it doesn't really matter for the purposes
26 of the discussion whether he was truly enraged or
27 not, because the 20-minute deliberate tirade and

1 harassment and intimidation against Attorney Mattei
2 and his firm is unacceptable and sanctionable. And
3 the Court will sanction here.

4 So for all these reasons, the Court is denying
5 the Alex Jones defendants the opportunity to pursue
6 their special motions to dismiss and will award
7 attorney's fees upon further hearing and the filing
8 of affidavits regarding attorney's fees. I would
9 note that the attorney's fees will be related only to
10 the conduct relating to the child pornography issue
11 and not for the discovery failures.

12 At this point, I decline to default the Alex
13 Jones defendants, but I will -- I don't know how
14 clearly I can say this. As this case progresses, and
15 we will get today before you leave a trial date in
16 the case now and a scheduling order. As the
17 discovery in this case progresses, if there is
18 continued obfuscation and delay and tactics like I've
19 seen up to this point, I will not hesitate after a
20 hearing and an opportunity to be heard to default the
21 Alex Jones defendants if they from this point forward
22 continue with their behavior with respect to
23 discovery.

24 So I'm going to call other matters now. I'm
25 going to ask that you -- that there not be any
26 conversations in the courtroom because I do have
27 other matters to call. I'm going to ask Counsel to

1 work on a scheduling order, pick a trial date. I am
2 going to need to see it before you leave. So if you
3 could maybe do that in another room, and then I'll
4 come back on the record for that.

5
6 *****

7 (END OF EXCERPT)
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THE HONORABLE BARBARA N. BELLIS, JUDGE

NO: UWY-CV18-6046437 S	:	SUPERIOR COURT
SHERLACH, WILLIAM	:	JUDICIAL DISTRICT
	:	OF FAIRFIELD
V.	:	AT BRIDGEPORT, CONNECTICUT
JONES, ALEX, ET AL.	:	JUNE 18, 2019

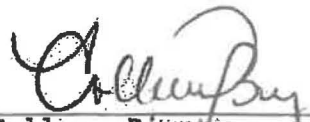
NO: UWY-CV18-6046438 S	:	SUPERIOR COURT
LAFFERTY, ERICA, ET AL.	:	JUDICIAL DISTRICT
	:	OF FAIRFIELD
V.	:	AT BRIDGEPORT, CONNECTICUT
JONES, ALEX EMRIC, ET AL.	:	JUNE 18, 2019

NO: UWY-CV18-6046436 S	:	SUPERIOR COURT
SHERLACH, WILLIAM, ET AL.	:	JUDICIAL DISTRICT
	:	OF FAIRFIELD
V.	:	AT BRIDGEPORT, CONNECTICUT
JONES, ALEX EMRIC, ET AL.	:	JUNE 18, 2019

C E R T I F I C A T I O N

I hereby certify the foregoing pages are a true and correct transcription of the audio recording of the above-referenced case, heard in Superior Court, Judicial District of Fairfield, at Bridgeport, Connecticut, before the Honorable Barbara N. Bellis, Judge, on the 18th day of June, 2019.

Dated this 18th day of June, 2019, in Bridgeport, Connecticut.


 Colleen Birney
 Court Recording Monitor

DOCKET NO: FBTCV186075078S

LAFFERTY, ERICA Et Al
V.
JONES, ALEX EMRIC Et Al

SUPERIOR COURT

JUDICIAL DISTRICT OF FAIRFIELD
AT BRIDGEPORT

ORDER 421277

12/17/2018

ORDER

ORDER REGARDING:
12/10/2018 123.00 MOTION FOR ORDER

The foregoing, having been considered by the Court, is hereby:

ORDER:

Having considered the pleadings and argument of cause, the court finds good cause for limited discovery in this matter. The court will take up each discovery objection following the filing of an affidavit by counsel indicating that counsel attempted to resolve each objection but have been unable to reach an agreement.

Judicial Notice (JDNO) was sent regarding this order.

421277

Judge: BARBARA N BELLIS

DOCKET NO: FBTCV186075078S

LAFFERTY, ERICA Et Al
V.
JONES, ALEX EMRIC Et Al

SUPERIOR COURT

JUDICIAL DISTRICT OF FAIRFIELD
AT BRIDGEPORT

ORDER 421277

12/17/2018

ORDER

ORDER REGARDING:
12/14/2018 126.00 MEMORANDUM IN OPPOSITION TO MOTION

The foregoing, having been considered by the Court, is hereby:

ORDER:

See ruling on underlying motion.

Judicial Notice (JDNO) was sent regarding this order.

421277

Judge: BARBARA N BELLIS

DOCKET NO: FBTCV186075078S

SUPERIOR COURT

ORDER 421277

LAFFERTY, ERICA Et Al
V.
JONES, ALEX EMRIC Et Al

JUDICIAL DISTRICT OF FAIRFIELD
AT BRIDGEPORT

12/17/2018

ORDER

ORDER REGARDING:
12/14/2018 129.00 MEMORANDUM IN OPPOSITION TO MOTION

The foregoing, having been considered by the Court, is hereby:

ORDER:

See ruling on underlying motion.

Judicial Notice (JDNO) was sent regarding this order.

421277

Judge: BARBARA N BELLIS

ALEX JONES and NORM PATTIS

INFOWARS.COM

June 14, 2019

Excerpt from 2:13 to 2:49

(Transcription from Electronic Recording)

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860.651.0258
www.falzaranocourtreporters.com

1 (Video excerpt begins at 2:13 p.m.)

2
3 ALEX JONES: Fotis Dulos, that's a Greek
4 name. They say this lawyer is a vicious piece of
5 scum. Connecticut lawyer getting hate mail for
6 defending the father of five whose wife was found
7 dead. Whether he's guilty or not he deserves a
8 defense. But I'm here to tell you I deserve a
9 defense of the First Amendment, but I'll go further
10 on Sandy Hook.

11 We have the Google Analytics that they
12 requested that we never looked at. Obviously they
13 know stuff we don't know like if you ever had Google
14 ads, like Google's like surveilling you, and it's
15 0.2-something percent out of billions of views we
16 basically never talked about Sandy Hook. And if I
17 believe Sandy Hook happened or didn't happen, it's my
18 right to say it as an American.

19 But I got tricked two years ago with --
20 three years ago -- Hillary saying, you know, Jones
21 says harass the families, Jones says it didn't
22 happen. Couple years before I decided I thought
23 Sandy Hook had happened. I wasn't the guy that first
24 questioned Sandy Hook but I'd seen so many staged
25 events, I mean I think the Iranians probably attached

1 our -- these ships. And my listeners are pissed at
2 me right now. And I've had top geopolitical
3 analysts, naval fodder bombers on, analysts, Navy
4 Seals, they're saying different things. We've had
5 big debates. You could edit the last two days' shows
6 together and have me say that Iran did it or the U.S.
7 did it or the Saudi Arabians did it because we're
8 having real intellectual discussions about what
9 happened.

10 And my lawyer is one of the top defense
11 lawyers in the county. Nobody debates that. He does
12 murder, he does First Amendment, he does it all.

13 When I first hired him a few months ago,
14 when Bob Barnes hired him, our general counsel, he
15 said, listen, even if you said this you have a right
16 and he would come down here, I'd say you need to
17 watch the videos that's out of context. I would
18 never say something if I don't know, I would play
19 devil's advocate down each avenue. Like it total
20 happened, he was on Prozac, videogame head, and then
21 next I'd say or I can see they staged Gulf of Tonkin
22 and they staged all this, I could see how it's a
23 totally staged managed event.

24 He's now had time and to great expense to
25 us to go through it all and he came to me like on

1 Monday, he said my God, it's true, it's a hoax. And
2 he said -- not Sandy Hook, but what they said about
3 me, he said, well, what's the real plan. And I said
4 it's to get our data in discovery and misrepresent
5 what it is and shut us down.

6 So I'm going to show you Google Analytics
7 today, I'm going to show you on screed all this.
8 You're listeners, you know that we never talked about
9 Sandy Hook in the first two, three years it happened
10 but a couple times, and then since they attacked me
11 I've covered it more.

12 I mean Megan Kelly came here and said it
13 was about another subject, about my divorce. And
14 then it was all about Sandy Hook and I said I think
15 Sandy Hook happened and, you know, I've always
16 questioned both sides. I think everybody has a right
17 but I'm sorry for families that got hurt. She edited
18 it together and we have the proof, it's going to come
19 out in court if it gets there, that I said all that
20 again and they sued me on that to get around Statute
21 of Limitations.

22 Well, now, ladies and gentlemen, I don't
23 think the judge in this case is a bad person but
24 they're under political pressure. And I get it, I'm
25 not an IT person. I've had to spend time I didn't

1 have trying to figure out what the hell is going on
2 and brought in outside consultants and spent hundreds
3 of thousands of dollars, and I won't even tell you
4 the number but half a million dollars trying to
5 figure out to answer the discovery. Because they go
6 we know you've got marketing, you got rich off Sandy
7 Hook. So we finally took a look at Google Analytics
8 and it's like 0.2 percent. And then most of that
9 turns out Bob Barnes has already done the analysis.
10 I couldn't believe it. I don't know who that guy
11 works with, man. He won't tell me but he knew the
12 exact numbers we got off of Google Analytics before
13 we ever had them. 98 percent of our statements said
14 Sandy Hook happened.

15 Now, if we want to say it didn't happen
16 that's our right as Americans. But 98 percent of the
17 0, .02, whatever percent, I'm going to show you this,
18 that's not my numbers, it's Google Analytics. We
19 never even talked about it but they're making it who
20 I am.

21 You've all been listening for the last two
22 days. I'm like I don't know who blew up the ship.
23 Ron Paul says the U.S. did it. Rand Paul says he
24 doesn't know. Trump says it's the Iranians. Let's
25 have a Navy Seal on. Let's have a famous Black Ops

1 operator on. Let's see what they say.

2 You could take any one of those interviews
3 and say Jones says the Iranians did it. Jones says
4 the U.S. did it. But does it matter? We're
5 Americans. Our forebearers fought and died that we
6 had a right to question things. But I've been told
7 and it's been admitted, even Supreme Court Justice
8 Clarence Thomas admits, the *New York Times* Op Ed, he
9 wants to get of press protections, the First
10 Amendment. And they admit to me -- it's in the news
11 that they are using me as the way to end it. That's
12 dirty.

13 So I'm going to be fine in all of this
14 because I didn't do what they said, but they're going
15 to use it to demonize free speech and that's what's
16 dangerous.

17 So the next two segments, then Nick Bagitz
18 (phonetic) will take over in the last segment, he
19 understands preemption.

20 We had Norm Pattis, an esteemed
21 constitutional First Amendment and civil rights
22 lawyer, roll thought this. But I want to be very
23 clear. I am proud of questioning Sandy Hook. I was
24 not the progenitor or the daddy of it. The public
25 questioned it. So it was the tail wagging the dog.

1 And I questioned it and then I looked into
2 some of the anomalies and found out that what people
3 said wasn't true. I found that that some of those
4 anomalies that people talked about were not accurate.
5 And then I was told by the media like four years ago,
6 apologize. And I said, yeah, no, I think it happened
7 now. I'm sorry I got to question things like babies
8 in incubators against the Iraq War or WMDs in Iraq or
9 the Smollet case, any of this. I said yeah, and my
10 God I had learned why Limbaugh said never apologize.
11 Because I never apologized because I always believed
12 what I was saying. But I thought, oh, you just want
13 an apology, your feelings are hurt, I'm going to
14 apologize.

15 And then the Democratic party operatives
16 that handle and manage all of those poor families and
17 use their grief to inflict wounds on Connecticut
18 every day go, oh, my God, we've got his ass now. He
19 says it's all fake, it's a lie. We've got a *Homeland*
20 show where he's the villain. I never said any of
21 that.

22 So now the gloves are off and now we're
23 going to get down to brass tacks. So I've learned a
24 lot through this process but now we've discovered a
25 major criminal felony attempt to set up an operation

1 and put us in prison. The FBI admits we're the
2 victim. We're going to break it all on the other
3 side.

4 (Break.)

5 ALEX JONES: Ladies and gentleman, I'm Alex
6 Jones, your host. We're battling for America there's
7 no doubt.

8 Norm Pattis is one of the most respected
9 criminal and civil rights, First Amendment lawyers
10 not just on the East Coast but in the country. And
11 of course you see his name everywhere because, you
12 know, he's involved in all these cases.

13 In the old days they didn't attack the
14 defense attorney because they defended somebody.
15 They said, oh, that's what defense attorneys do. You
16 have a right of representation.

17 Well, now I've got articles right here
18 calling him the scumbag of the earth. So we should
19 probably just get this out in the open right now
20 about the big case you're handling right now in
21 Connecticut and just a minute or two on that. But
22 like you said during the break you're almost more
23 demonized for representing me than somebody they're
24 accusing of killing his wife.

25 NORM PATTIS: You are not popular in

1 Connecticut. People lost friends and family at Sandy
2 Hook and every time it said that you deny it people
3 feel as though you've stabbed them in the chest.

4 With respect to Ms. Dulos, she's a lovely
5 -- apparently was if she's dead -- in fact a lovely
6 mother. I want to correct one thing you said on
7 behalf of Mr. Dulos. There is circumstantial
8 evidence that she's dead but there is no body yet.
9 Police still look and she may well be alive. If she
10 is dead there is no evidence that my client killed
11 her. None.

12 ALEX JONES: No, you're right. They're not
13 saying she's dead in fact. I'm not the lawyer here.
14 I'm just getting out here that you were telling me
15 that lawyers you've known 30 years won't talk to you
16 representing me.

17 NORM PATTIS: Yeah. It's amazing. The
18 courthouse that served Sandy Hook is Danbury. I was
19 there the other day and I guy I've known and worked
20 the cases with wouldn't talk to me. And I'm thinking
21 what I did I do to piss him off. And I called a
22 friend of mine and he said he's upset that you're
23 representing Alex Jones. People don't like him,
24 people -- it's surprising. You know, for the life of
25 me I don't understand why.

1 ALEX JONES: Well, my frustration is most
2 people who are listeners are supportive, literally 50
3 out of 1. But they'll walk over in front of my
4 family and say you're a Russian agent or stop saying
5 nobody died at Sandy Hook. And I'm like, now I'm
6 like literally I've got Google Analytics said 0.2
7 percent ever talked about it. The media and Hillary
8 made it like I'm Mr. Sandy Hook. My listeners hear
9 it, they run off a cliff.

10 I told this story yesterday, they're
11 talking about analytics, I don't look at analytics,
12 but Joe Rogan but out 30-something clips when I was
13 on with him in February.

14 NORM PATTIS: Wow.

15 ALEX JONES: And the top clip at 14 million
16 views on YouTube, not counting other platforms. It
17 has over a hundred million views right now. Joe, I
18 talked to Joe a few weeks ago, it's bitter than Elon
19 Musk, it's the biggest thing he's every done. 14
20 million for the interview. The average video of 30
21 videos is 3 million views.

22 NORM PATTIS: Wow.

23 ALEX JONES: Guess what the lowest video
24 is? And look at that, that's 14 million right there,
25 you see that? 14 million. That's the top clip. 14

1 mill.

2 Now, and he was famous for dialing it down
3 and not pay you the advertising. The word is it's
4 like probably 60 mill on there. I've had films on
5 Google video before they took it down with a hundred
6 mill.

7 NORM PATTIS: Wow.

8 ALEX JONES: Okay. So I'm the kind daddy,
9 okay? And I'm here to -- and I'm not bragging, I'm
10 here to tell the little pimps, the Senator Murphys
11 and the prosecutor, the Obama appointed prosecutor
12 that's doing all this, bitch, I don't need to talk
13 about poor dead kids to have listeners. I've got
14 news stacked to the rafters. My listeners questioned
15 9/11. I covered it. My listeners questioned this
16 latest gulf attack, which I think was probably Iran.
17 My listeners are pissed. My listeners questioned
18 Sandy Hook and I looked at both sides. So stop
19 saying I'm making a living off these poor children
20 when I've been saying for years I thought they died.

21 NORM PATTIS: Well, let me tell you, I've
22 only been involved in your case for about three
23 months and I've grown weary listening to the claim
24 that someone there is a secret cabal of people
25 meeting together deciding how to offend people and

1 then profiting off of it, driving the decision on
2 what to cover here. There is no evidence.

3 ALEX JONES: Oh, my listeners are pissed.

4 NORM PATTIS: There is no --

5 ALEX JONES: My listeners are pissed that
6 I'm not saying these attacks on ships were staged by
7 our government. I think it was probably Iran.

8 NORM PATTIS: But my point is --

9 ALEX JONES: The point is I've got a
10 responsibility to say what I think.

11 NORM PATTIS: You have a right to say what
12 you think and your readers can -- or your listeners
13 can either listen or not. You have many people who
14 listen. And what your critics don't understand is
15 you're not making people listen; you're not putting
16 ideas in people's heads. Since I've begun to
17 represent you I've gotten emails from angry listeners
18 of yours saying why are you toning him down on Sandy
19 Hook? I'm not toning you down. If I've learned one
20 thing representing you in the last three months, Alex
21 Jones does was Alex Jones wants to do. I'm not aware
22 of some secret genie in the bottle pulling your
23 strings saying move left, move right.

24 There is no conspiracy at Infowars that is
25 seeking to profit off of the woe and misery and fear

1 of others. This is a content driven enterprise. You
2 do sell products that I've seen advertised, but the
3 relationship between the content, the editorial
4 content and the marketing of products, if there is a
5 marketing effort that I've yet been unable to
6 discern, it's nonexistent. And I don't -- you have
7 spent a lot of money on me and I'm sorry. You've
8 flown me down here at your expense and put up for --

9 ALEX JONES: Oh, you been nothing --

10 NORM PATTIS: No but listen to me. But
11 listen to me. It is a fool's errand. We continue to
12 go back to court in Connecticut on a weekly basis to
13 sing for your supper and, you know, they say produce
14 marketing reports; there aren't any. Produce sales
15 analytics; there aren't any. So now we're in a
16 dispute about --

17 ALEX JONES: They beg me to have marketing
18 meetings.

19 NORM PATTIS: Right.

20 ALEX JONES: They beg me to plug; I won't
21 do it.

22 NORM PATTIS: Well, I wish that -- this is
23 not an invitation to Judge Bellas, although if she's
24 listening she may want to accept it. If she wants to
25 come down I'd expect you'd host her. I have probably

1 --

2 ALEX JONES: We've debated having the other
3 side in.

4 NORM PATTIS: I think which is considerate.

5 ALEX JONES: What we'll cover next segment,
6 the emails and the big criminal action.

7 NORM PATTIS: Oh, yeah.

8 ALEX JONES: And the big announcement is
9 coming up next segment. But it's just -- do you
10 think the liberals in Connecticut that are doing this
11 really believe the *Homeland* version of me? Because I
12 know they know I don't have an email at Infowars. I
13 got rid of it 10 years ago but they keep saying I'm
14 covering that up. So they know this isn't true.

15 NORM PATTIS: The funny thing is you're --
16 I wish you'd be rebranded. You're not Alex Jones,
17 conspiracy theorist. I'm not sure what the right
18 brand is, but who are the real conspiracy theorists.
19 People seem to think back and think that you're an
20 evil genius that has it all planned and you've got a
21 med at every corner and you're going to profit off of
22 their fears.

23 I love you. I've met a lot of great people
24 that work here and I've enjoyed coming down here.
25 But this is not IBM. There is not a corporate

1 handbook telling people when to move left and move
2 right. You sort of represent a cyclone with a pulse
3 and when you blow through here I watch the bodies up
4 against the wall trying to figure out how to peel
5 themselves off. It works. Your viewers trust you
6 because you're honest, you're real, you say what on
7 their mind.

8 Now, the biggest eye-opener to me in this
9 case has been watching videos that he plaintiffs rely
10 on in the Sandy Hook case. I don't like Mr. Halbig.
11 He's sent me any number of emails before I met you.
12 I think the guy is a crackpot. So what do I do when
13 I see that name, Halbig? I tune it out.

14 There was a point where you listened to him
15 and to defend you I've been required to watch some of
16 those videos and it was a jaw-dropping experience
17 because he raises good points. Now, he may
18 overestimate --

19 ALEX JONES: Oh, he's been on like National
20 TV as the -- like *Good Morning America* as the top
21 expert. He said it didn't happen. We went off him.
22 I think he really means what he's saying. The point
23 is he doesn't work for us; we don't direct him in
24 this whole conspiracy.

25 NORM PATTIS: But he take -- let me tell

1 you a story that I've not yet heard on your network.
2 I have good friends who are big-time lawyers in the
3 Pine Ridge Indian Reservation, Sioux, and they don't
4 believe the 9/11 narrative. And so one of the them
5 got me on the phone one day and said, look at your
6 computer. And I saw an aircraft that was crashed
7 into the Pentagon. That's not how it happened.
8 Look, there's no tail on the airplane but there's no
9 damage to the place where the tail should have been.
10 This was staged.

11 Now, something told me that he had about 6
12 screws loose on a 5-screw devise. But I looked at
13 the photo and as a lawyer I thought, you know, if you
14 stood in front of a jury and argued that piece you'd
15 get it. But I couldn't follow on it.

16 ALEX JONES: Exactly. He had the right to
17 say it.

18 NORM PATTIS: That's exactly right.

19 ALEX JONES: And that's what I'm saying is.
20 We've been -- let me tell you, my listeners, because
21 I think Iran was probably behind these latest
22 attacks, my listeners were all mad at me for saying
23 --

24 NORM PATTIS: Well, who did they think it
25 was?

1 ALEX JONES: They think the U.S.
2 Government. They think Trump did it.

3 NORM PATTIS: And that's the point. People
4 don't -- people are so distrustful of the Government
5 they're desperate of answers.

6 ALEX JONES: And they're trying to make
7 that question illegal. I have been a loyal son of
8 the Republic and my family for more than 14
9 generations it has been, and I know what they do when
10 you expose them. They say you're a pedophile. We
11 knew it was coming. And when the Obama appointed
12 U.S. Attorney demanded out of 9.6 emails, 9.6 million
13 emails in the last 7 years since Sandy Hook,
14 metadata, which meant tracking the emails and where
15 they went, well, we fought it in court and the judge
16 ordered for us to release a large number of those
17 emails. That's Chris Mattei that got that done. A
18 very interesting individual at the firm of Koskoff &
19 Koskoff run by Senator Murphy and Senator Blumenthal
20 that say for America to survive, quote, "I must be
21 taken off the air." So they're very naked about what
22 they stand for.

23 So, you know, I had them try to set me up
24 with the Russians and I reported it to the FBI and
25 that kind of freaked them out a lot. And that's all

1 on record. It's been covered in the national news.
2 So that didn't work too well.

3 And so we learned in just the last few days
4 that when they wanted these hundreds of thousands of
5 emails out of the 9.6 million that they had
6 attachments to them that no one would know what they
7 were. We hadn't opened this. The FBIs came out and
8 said I'm the victim in a statement that's come out
9 officially. The U.S. Attorney's Office in
10 Connecticut.

11 But what's interesting is we checked with
12 real IT people because we're not IT folks. We made
13 some calls and they said, no, you wouldn't know what
14 was in attachments and you wouldn't know what they
15 link to because the FBI looked at it, they said we're
16 the victim. It was hidden in Sandy Hook emails
17 threatening us, those child porn. So it's on record
18 we were sent child porn. We're not involved with
19 child porn, but the fact is it's not a needle in a
20 haystack, it's fields of haystacks. And they get
21 these emails a few weeks ago and they go right to the
22 FBI and say we've got him with child porn. The FBI
23 says he never opened it and he didn't send it. And
24 then they act like, oh, they're our friends, they're
25 not going to do anything with this. Go to hell. I

1 wasn't born yesterday. I was born in the dark but it
2 wasn't last night.

3 So whatever is going on I'm offering a
4 \$100,000 reward. Not 10,000. A \$100,000 reward for
5 the arrest and prosecution. And I've had \$115,000
6 bonuses in contests before, so I'll pay \$100,000.
7 We're going to release the metadata in the next few
8 days on Infowars.com for the email address, the
9 company, and the folks at the company are going to
10 track it back and they're going to find out. And
11 we're going to pay the \$100,000 and you're going to
12 go to prison.

13 By the way, more than 20 people that have
14 threatened us and my crew have gone to prison. When
15 people threatened to kill George Bush or threatened
16 to kill Obama we reported you. You went to prison.
17 And law enforcement knows we are law abiding. We're
18 not offensively committing crimes.

19 So \$100,000 reward and we'll release the
20 metadata by Monday of who sent this and when they're
21 arrested you get \$10,000. When they're convicted you
22 get \$90,000.

23 Now, I wonder who during discovery would
24 send emails out of millions and then know what to
25 search and look at? I don't know. I just think

1 people are smart enough to know where to look at the
2 ISPs. \$100,000. Oh, did I mention on conviction
3 another 100,000? 200,000 -- no, no, wait. One
4 million dollars. One million -- I can't help it,
5 I've always done what I say I'll do. I don't have a
6 lot of money but I'll sell my house. One million
7 dollars on conviction for who sent the child porn.
8 One million dollars. We're going to publish all the
9 metadata. We're going to turn you loose; the ISPs,
10 the law enforcement. You know who did it. One
11 million dollars. So now it's not 10,000 for a
12 arrests, 100,000 for arrest. It's one million for
13 conviction. One million dollars.

14 You think when you call up, oh, we'll
15 protect you, we find the child porn. I like women
16 with big giant tits and big asses. I don't like kids
17 like you goddamn rapist f-heads. In fact, like this,
18 you fucks are gonna get it you fucking child
19 molesters. I'll fucking get you in the end you
20 fucks.

21 Now, we're done right there. I know I
22 should delate it in radio, probably still went out, I
23 don't care. You're trying to set me up with child
24 porn, I'm going to get your ass. One million
25 dollars. One million dollars you little gang member.

1 One million dollars to put your head on a pike. One
2 million dollars, bitch. I'm going to get yo' ass.
3 You understand me now? You're not ever gonna defeat
4 Texas you sacks of shit, so you get ready for that.

5 Now, I don't usually use French but I'm
6 pissed right now.

7 Norm Pattis, you take over this segment,
8 the next -- I apologize, my use of French here, but
9 I'm really pissed right now.

10 NORM PATTIS: Yeah, I get that.

11 ALEX JONES: And I'm not putting up with
12 this goddamn bullshit anymore.

13 NORM PATTIS: So you should have talked to
14 me be about the reward structure because --

15 ALEX JONES: No, I don't -- it's one
16 million.

17 NORM PATTIS: But listen to me. I'm your
18 lawyer and it would behoove you to listen from time
19 to time. You don't ever want to create an interest
20 in the outcome and a potential witness.

21 ALEX JONES: Ha, ha, ha.

22 NORM PATTIS: No, no, I'm here --

23 ALEX JONES: I'm gonna -- why does the law
24 enforcement say there's a -- why does law enforcement
25 say \$5,000 dead or alive? One million. Because we

1 all know who did it.

2 NORM PATTIS: So let's talk about what
3 happened here. I was --

4 ALEX JONES: You think I won't pay one
5 million?

6 NORM PATTIS: I didn't say that. I just
7 don't want you to create an interest in the outcome
8 of a person who testifies because they now have a --
9 there is a contingent interest in telling the truth.

10 ALEX JONES: Well, then why does law
11 enforcement give bounties?

12 NORM PATTIS: That's different than having
13 contingent interest in the testimony.

14 ALEX JONES: No, no, no, no, no. We're
15 going to get --

16 NORM PATTIS: I want to focus on the issues
17 that --

18 ALEX JONES: They sent me child porn.

19 NORM PATTIS: I want to focus on the issue
20 that got you angry because that's a great issue,
21 okay? And Aristotle once said that a wise man gets
22 angry in the right way, at the right time, in the
23 right reason. You're so angry right now you're just
24 a touch unwise, but I'm still behind you 100 percent.

25 You should be angry because here is what

1 happened.

2 ALEX JONES: Norm, every time I'm on the
3 attack I win.

4 NORM PATTIS: Listen to me. Listen to me.
5 Listen to me. You should be angry. I'm behind you
6 100 percent. Here is what I learned. I got a call
7 the other day saying that information we were court
8 ordered to provide, metadata, had been run by a
9 California data processing firm for your adversaries
10 in the Sandy Hook suit. They found an email that
11 they shouldn't, quote, "have." They turned it over
12 to the FBI. The FBI went through the metadata and
13 found 12 emails that contained pdfs or images
14 imbedded in emails of child porn. Some of those
15 emails were directed to you and they were very
16 hostile and I'm not going to use the language that
17 were used in those emails. 12 images of child
18 pornography if knowingly possessed by you, a member
19 of your staff or me as your lawyer could land anyone
20 or all of us in prison for up to five years.

21 ALEX JONES: Yeah, but they sent it.

22 NORM PATTIS: When I heard this I fell over
23 and I've not stopped being angry since. I'm not as
24 angry as you but I'm angry.

25 The point is that somebody directed child

1 pornography into your email accounts hoping that you
2 would open it so that when you opened it there would
3 be direct evidence that you had viewed knowingly and
4 possessed child port.

5 ALEX JONES: And now imagine they want
6 metadata out of hundreds of thousands of emails that
7 I got and they know right where to go. What a nice
8 group of Democrats. How surprising. What nice
9 people, Chris Mattei. Chris Mattei, let's zoom in on
10 Chris Mattei. On nice little Chris (pounding fist)
11 Mattei. What a good American. What a good boy. You
12 think you'll put on me what (growling).

13 Anyways, I'm done. Total war. You want
14 it, you got it. I'm not into kids like your
15 Democratic party, you cocksuckers. So get ready.

16 Anyways, you're my defense lawyer.

17 NORM PATTIS: Yeah, I am (chuckling).

18 ALEX JONES: I'm not putting up with these
19 guys anymore, man, and their behavior because I'm not
20 an idiot. They literally went right in there and
21 found this hidden stuff, oh, my God, oh, my -- and
22 they're my friends. Oh, we want to protect you now,
23 Alex. Oh, oh, oh, you're not going to get in trouble
24 for what we found. F-U, man. F-U to hell. I pray
25 God, not anybody else, God visit vengeance upon you.

1 In the name of Jesus Christ and all the saints I pray
2 for divine intervention against the powers of Satan.
3 I literally would never have sex with children. I
4 don't like having sex with children. I would never
5 have sex with children. I am not a Democrat. I am
6 not a liberal. I do not cut children's genitals off
7 like the left does.

8 All right, Norm. I apologize to our
9 affiliates. We delayed most of it out but I've been
10 fire breathing today because I've talked to IT people
11 and they say you got 9.6 million emails, you've got
12 hundreds of thousand sent to the court. These are
13 hidden links that they knew right what to go to, and
14 these people were appointed by Obama and it's just
15 like -- God, I'm so sick of them. I am so sick of
16 their filth and living off the dead kids of Sandy
17 Hook, and I've got all the statistics that I covered
18 it like 0.2 percent. Even with all the coverage now
19 they make it who I am, they live off these dead kids
20 and they say I did it because they watched *Homeland*
21 and they believe their own filthy lies. And then
22 they find, out of grains of sand at the beach they
23 find the magic child pornography. How obvious is
24 that we've got a problem in this country and it's out
25 of control.

1 So we have 9 minutes left. I appreciate
2 you being a nice person. And we'll go over some of
3 the metrics and some of the things I talked about.

4 NORM PATTIS: If I had one gift I could
5 give you it would be to put Sandy Hook in the
6 rearview mirror forever. I hate to see people put a
7 burr under your saddle. I fear --

8 ALEX JONES: It's not Sandy Hook --

9 NORM PATTIS: No, no, no, no, stop. Stop.
10 You're going to listen to me. You brought me down
11 here. There were 9.6 million emails that were
12 searched. We turned over about 57,000 of them. In
13 12 of them there were imbedded images of child
14 pornography. As it turns out those emails were never
15 opened; the images were never opened. There's no
16 evidence that anybody here or anybody affiliated with
17 you or you ever searched them. So clearly they were
18 placed in there as malware, as evil intended internet
19 communications.

20 I have spoken to federal prosecutors. They
21 regard you as a victim. They do not regard you as in
22 any way a suspect. No one is going to search your
23 computers or try to build a case against you. The
24 news takeaway here --

25 ALEX JONES: I want them to. I want them

1 to track it back to --

2 NORM PATTIS: No, you're not hearing me.

3 ALEX JONES: -- you know who.

4 NORM PATTIS: You are not a suspect; you
5 are not a target; you are not a person of interest.
6 You are a victim and that's the story here.

7 ALEX JONES: I wonder who the person of
8 interest is.

9 NORM PATTIS: Look. You're showing Chris
10 Mattei's photograph on the air.

11 ALEX JONES: Oh, no, that was an accidental
12 cut. He's a nice Obama boy. He's a good --

13 NORM PATTIS: Chris Mattei is your
14 adversary in this litigation just as I am the
15 adversary of the people of -- that have sued you, and
16 it is my responsibility to take their case apart if I
17 can. And he will attack you.

18 ALEX JONES: He's a white shoe boy that
19 thinks he owns America.

20 NORM PATTIS: I'm not going to engage in a
21 personal attack on Chris Mattei. I want to find out
22 who sent the emails to you and when I find that
23 person then I will go to war.

24 ALEX JONES: I just wonder --

25 NORM PATTIS: Alex. Alex. Alex.

1 ALEX JONES: I've talked to IT. You
2 understand hidden links in an email no one looked at,
3 to find that is like finding a needle in 5,000
4 haystacks.

5 NORM PATTIS: I agree. They used --
6 Koskoff, Koskoff & Bieder contracted out --

7 ALEX JONES: It means there's no limit to
8 what they're going to do.

9 NORM PATTIS: They contracted out to a
10 sophisticated data mining firm. They spent probably
11 \$100,000 to go through your emails looking for
12 whatever they could find and they did find this. You
13 believe that that was placed there and they knew
14 where to look and how to find it.

15 I'm not -- I don't have evidence of that
16 yet. I represent -- listen to me, the young man,
17 listen to me. I represent people that are accused --

18 ALEX JONES: They want a war; they're about
19 to get one. That's all I'm just telling right now.
20 I ain't screwing no kids. I'm not like -- I'm not a
21 Democrat, man.

22 NORM PATTIS: Hit the pause button. I
23 represent people accused of possessing child porn all
24 the time. Some of them are set up. You have been
25 set up. Let's find the identity of the person who

1 set you up and not leap to conclusions about who it
2 might be. If it was the other side, the other
3 lawyers, I would be shocked. If it was some other
4 person; a political operative, I would not be
5 shocked. We will publish the metadata, you've got
6 samples of it.

7 ALEX JONES: Yeah, (unintelligible).

8 NORM PATTIS: We're in the process right
9 now of working with the U.S. Attorney's Office to get
10 the actual communications. When I get those I will
11 give them to you, you publicize them and let your
12 viewers and listeners look.

13 ALEX JONES: I've already been accused of
14 being a damn Russian, now I'm a frickin' pedo, man?

15 NORM PATTIS: Be bigger --

16 ALEX JONES: Like what the hell, dude. I'm
17 sick of you Democrats. You're like the scum of the
18 planet.

19 NORM PATTIS: Be bigger than the people who
20 accuse you. There are people out there who want you
21 because they're looking for a voice. They don't
22 understand what's going on in this country. When you
23 lose focus and lose that because of anger they lose
24 an anchor. They're looking to you for answers, not
25 anger. Be angry, but as Aristotle once said be angry

1 at the right person, at the right time, at the right
2 way to the right degree.

3 ALEX JONES: I told you when they did this,
4 I said we'd never cover it, you saw are books --

5 NORM PATTIS: No, you did. That's true.

6 ALEX JONES: -- we didn't cover any of --
7 we covered like 10 times or something, and I showed
8 you what we had, the numbers, we never covered it.
9 I'm like, I don't know why they want this.

10 NORM PATTIS: You're dead right.

11 ALEX JONES: Why do they want the metadata.
12 I said they want to plant something on me.

13 NORM PATTIS: So --

14 ALEX JONES: I told you that three weeks
15 ago and now, now they're like --

16 NORM PATTIS: Okay, look. You are dead
17 right. When I came down here, you know, I didn't
18 know who you were then -- I knew who you were, I
19 could place you on the political landscape. I hadn't
20 watched your show. I've made a study of you in the
21 last three or four months and you've won me over
22 because I think you're an honest and angry American.
23 But sometimes you're not angry at the right things
24 and sometimes you get angry too quickly at the wrong
25 things.

1 ALEX JONES: Well, you try --

2 NORM PATTIS: But let --

3 ALEX JONES: You try people try to plant
4 child porn on your computer, man. I mean --

5 NORM PATTIS: Let's find out who did it and
6 then take them down but not leap to --

7 ALEX JONES: That's why I said one million.
8 I'm not BS-ing. One million dollars when they are
9 convicted. The bounty is out, bitches, and you know
10 you feds, they're going to know you did it. They're
11 going to get your ass you little dirtbag. One
12 million, bitch. It's out on yo' ass.

13 NORM PATTIS: Well, if they're the grass I
14 will be your lawnmower but let's make sure we're
15 mowing the right lawn, okay? You have every reason
16 to be angry.

17 ALEX JONES: One million. I pay all debts.
18 One million is on the street for who sent me -- and
19 you're going to -- we're going to get the emails,
20 we're going to public them next week, and we're going
21 to make a whole thing. We're not going to show the
22 child porn but we're going to put the emails out and
23 we're going to show you where they came from and
24 what. One million on the street.

25 NORM PATTIS: And where I come from what's

1 truly terrifying is this is the bottom feeding part
2 of the effort to take you down, as you've been de-
3 platformed, you've been censored --

4 ALEX JONES: Okay. Well, now a million
5 dollars is after them.

6 NORM PATTIS: All right.

7 ALEX JONES: So I bet you'll sleep real
8 good tonight you little jerk, because your own
9 buddies are going to turn you in and you're going to
10 go to prison you like white shoe boy jerkoff. You
11 son of a bitch. Fuck. I mean I can't handle them.
12 They want war, they're gonna get war (pounding desk).
13 I'm sick of these people, a bunch of chicken craps,
14 they've taken this country over. They want to attack
15 real Americans.

16 NORM PATTIS: Well, be the real American
17 and the real American attacks the right target.

18 ALEX JONES: I'm going to.

19 NORM PATTIS: Let's find that target and
20 attack.

21 ALEX JONES: Oh, my God --

22 NORM PATTIS: Oh, come on now.

23 ALEX JONES: I've talked to people.
24 There's no way out of millions of emails that didn't
25 even say child porn. They horned in on it. God

1 almighty.

2 NORM PATTIS: You're assuming they horned
3 in on it. We don't know what the analytical facts --

4 ALEX JONES: And whoever did it told them
5 to do it. We're gonna get them. One million. One
6 million dollars is on the street against you. You
7 didn't destroy America on time, bitch. I am pissed,
8 man. I would give everything I have to stop living
9 in this world with these people.

10 Norm, let's be nice here. Let's go into
11 the documents. Oh, look, Norm, we have Google
12 Analytics they asked for. How much did we cover
13 Sandy Hook. Let's roll some of that. This is from
14 Google. 0.28 percent. With all the coverage they've
15 done that's how much Google says we covered it. Boy,
16 how does that fit in their model that I live off the
17 dead kids that these vampires feed off of? Not me.

18 NORM PATTIS: You will win the lawsuit in
19 Sandy Hook. As a matter of law it was protected
20 speech and no defamatory and it was --

21 ALEX JONES: And they know that. So
22 there's going to be child porn put on my servers.

23 NORM PATTIS: That may well be the plan
24 that some as yet identified person engaged in. We
25 have to identify that person. It's easy to make an

1 accusation; hard to prove it.

2 ALEX JONES: Oh, I make an accusation. I'm
3 sure that U.S. Attorneys appointed by Obama are sweet
4 little cupcakes.

5 NORM PATTIS: No, come on, Alex.

6 ALEX JONES: I would never accuse them of
7 something.

8 NORM PATTIS: I didn't come on your show to
9 be made out to look like a naïve fool. I'm as tough
10 as any lawyer you'll ever meet.

11 ALEX JONES: I'm not saying you're naïve.
12 No, I'm sure -- you don't think errand boy did this.
13 I'm actually not saying that. This is a setup and
14 the way it's like, oh, Alex, we have this but we're
15 not going to tell anybody. We're not going to tell
16 anybody, dude.

17 I've never screwed a kid; I don't want to
18 screw a kid. Don't you ever project onto me, don't
19 you ever do it, you lowlifes. And so if they want
20 war, you know, it's not a threat, it's just like an
21 AC/DC song, if you want blood, you got it. Blood on
22 the streets, man. I mean I am not going to sit here
23 in my life and have these dirtbags say that I done
24 these things I haven't done, and then know where to
25 go and weasel in and find this perfect thing. It's

1 ridiculous how obvious it is. Did you think I'd roll
2 over and spray crap out my ass and show my belly and
3 piss on myself to bow down to you? You just summoned
4 war. So get ready.

5 And I'm just asking the Pentagon and the
6 patriots that are left and 4 chan and 8 chan
7 (phonetic) and anonymous, anybody that's a patriot, I
8 am under attack and if they bring me down they'll
9 bring you down. I just have faith in you. I'm under
10 attack and I summon the mean war. I summon all of it
11 against the enemy. I will never sell out to these
12 people.

13 Anyways, what to make some closing
14 comments?

15 NORM PATTIS: Hi, mom.

16 No, look, Alex, I can't respond to the
17 rage. I get it.

18 ALEX JONES: Yeah, how would you like this?

19 NORM PATTIS: I would not --

20 ALEX JONES: How would you like an Obama
21 appointed U.S. Attorney, man, that literally found a
22 needle in a field of haystacks and tried to go to the
23 feds and get me indicted. I am -- it's war, dude.
24 Killing me would be better. Turning me into a child
25 molester, into your liberal God I'll never be a sack

1 of filth like you.

2 And now I ask my listeners and everyone,
3 you claimed I sent people. I never sent anybody.
4 And I want legal and lawful action. But I pray to
5 God that America awakens. Will Texas be defeated?
6 You will now decide. This is war.

7

8 (End of video excerpt: 2:49 p.m.)

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CERTIFICATE

I hereby certify that the foregoing 36 pages are a complete and accurate transcription to the best of my ability of the electronic recording of the Alex Jones Infowars.com broadcast on June 14, 2019.



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